

Application No. 10/044,106
Amendment dated October 18, 2006
Reply to Office Action mailed June 19, 2006

Attorney Docket No. 131105-1003

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REMARKS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested. Claims 1-17 remain pending in the application.

CLAIM REJECTIONS UNDER 35 USC § 102(e)

The Examiner rejected Claims 1-3, 6-9, and 13-15 under 35 USC § 102(e) as being anticipated by U.S. Patent No. 6,526,056 to Rekhter et al (the "Rekhter reference").

By way of background, the present application is directed to a route target filtering system and method for a virtual private network (VPN). A VPN may be configured in a hub-and-spoke topology where the firewall is the hub through which all traffic is routed to the spokes.

The Rekhter reference is directed to a routing scheme which reduces a transit router's data storage requirement by allowing a PE router to maintain VPN specific information, but relieving the transit routers the need to do so (Col. 4, lines 45-49 of Rekhter). According to the Rekhter reference, when an ingress PE router receives a packet from a customer enterprise, it provides the packet with an internal routing field (Col. 4, lines 49-55 of Rekhter). The transit routers interpret the internal routing field as specifying the route through which to forward the packet to an egress channel and to identify the next router. Thus, the transit routers need not concern themselves with complete routes to locations in the network. The egress PE router can determine the particular VPN into which it is to forward the packet, because the ingress PE router which can identify the VPN from the customer enterprise from which it received the packet specifies the target VPN in the internal routing field's contents (Col. 4, lines 60-64 of Rekhter).

Independent Claim 1 recites the following step:

an import filter receiving a plurality of routes, the plurality of routes having a next hop routing information, the import filter accepting a first subset of the routes according to an import target policy; and

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a re-export filter receiving the plurality of routes, modifying the next hop information of a second subset of the routes, and distributing the modified routes.

In rejecting Claim 1, the Examiner said "Rekhter discloses in FIGs. 1 and 7 an import filter receiving a plurality of routers, the plurality of routers having a next hop routing information, the import filter accepting a first subset of routers according to an import target policy (Col. 6, lines 53-65; Col. 7, lines 30-38)."

Applicants respectfully disagree with the Examiner assertion. A review of the Rekhter reference indicates that Col. 6, lines 53-65 of the Rekhter reference describes a router PE2 (i.e., an ingress router) that determines the particular VPN into which it is to forward the packet from the fact that it received the packet over its link with CE2 (i.e., customer edge router). Col. 6, lines 64-68 of the Rekhter reference discusses that PE2 knows that PE1 is the edge router (i.e., egress router) to which it should direct the packet in order to reach the particular VPN. Consequently, the transit routers P1 and P2 shown in FIG. 1 of the Rekhter reference need not concern themselves with the VPN specific information. Col. 7, lines 30-38 of the Rekhter reference discusses that PE2 tags a packet with two tags T2 and T3. The tag T2 allows a router to forward the packet to the next router while the tag T3 allows an egress router to forward the packet to the particular VPN.

Since the Rekhter reference does not disclose the elements recited in Claim 1, Applicants respectfully submit that Claim 1 is not anticipated by the Rekhter reference. Accordingly, Applicants request that the Examiner withdraw the rejection of Claim 1 and pass Claim 1 to allowance. Claims 2-6 depend from Claim 1, and these dependent claims include the limitations of Claim 1. Applicants request that the Examiner pass Claims 2-6 to allowance.

Independent Claims 6 and 13 generally recite the same limitations that are recited in independent Claim 1. Applications submit that Claims 6 and 13 are allowable for the same reasons stated above. Claims 7-12 depend from Claim 6, and Claims 14-17 depend from Claim 13. Applicants request allowance of these dependent claims.

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CLAIM REJECTIONS UNDER 35 USC § 103

The Examiner rejected Claims 4, 10 and 16 under 35 USC § 103(a) as being unpatentable over the Rekhter reference in view of Lin. Applicants submit that Claims 4, 10 and 16 are allowable in view of the arguments presented in support of the independent claims 1, 6, and 13.

CONCLUSION

In light of the arguments set forth above, it is respectfully submitted that the application is now in allowable form. Accordingly, reconsideration and allowance of the application is respectfully requested.

It is believed that no additional fees are due at this time. If this is incorrect, Applicant hereby authorizes the Commissioner to charge any fees, other than issue fees, that may be required by this paper to Deposit Account No. 07-0153. The Examiner is respectfully requested to call Applicant's Attorney for any reasons that would advance the current application to issue. Please reference Attorney Docket No. 131105.1003.

Dated: October 18, 2006

Respectfully submitted,

GARDERE WYNNE SEWELL LLP


Michael A. Rahman
Registration No. 43,872

3000 Thanksgiving Tower
1601 Elm Street
Dallas, Texas 75201-4761
(214) 999-4992 - Telephone
(214) 999-3992 - Facsimile